

**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

## **PART 70**

# **PERMIT TO OPERATE**

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

**Operating Permit Number:** OP2006-062  
**Expiration Date:** AUG 31 2006  
**Installation ID:** 510-1093  
**Project Number:** 2005-01-028

**Installation Name and Address**

Brenntag Mid-South, Inc.  
139 E. Soper St.  
St. Louis MO 63111  
St. Louis City

**Parent Company's Name and Address**


Brenntag Mid-South Inc.  
1405 Highway 136 West, PO Box 20  
Henderson, KY 42419

**Installation Description:**

This installation operates as a chemical distribution facility of a variety of solvents, caustics, and acids. This installation handles the receipt, unloading, and storage of bulk liquid chemicals. This installation loads outgoing tankers, transfers and fills from bulk storage tanks or incoming tankers into containers for storage and delivery to customers, and blends for custom solvent mixtures for bulk delivery to customers or for transfer into containers. This installation is classified as major for volatile organic compounds (VOCs).

SEP - 1 2006

Effective Date

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

This installation operates as a chemical distribution facility of a variety of solvents, caustics, and acids. This installation handles the receipt, unloading, and storage of bulk liquid chemicals. This installation loads outgoing tankers, transfers and fills from bulk storage tanks or incoming tankers into containers for storage and delivery to customers, and blends for custom solvent mixtures for bulk delivery to customers or for transfer into containers.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
1999	0.09	0.00	0.71	18.89	0.15	--	0.74
2000	0.08	0.00	0.64	13.78	0.13	--	0.63
2001	0.09	0.00	0.76	13.44	0.16	--	0.59
2002	0.05	0.00	0.61	5.28	0.51	--	0.74
2003	0.05	0.00	0.63	3.51	0.53	--	2.11
2004	0.06	0.00	0.82	4.52	0.69	--	0.57

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Tank #3 - 221,000 Gallon Aviation Fuel Storage Tank (EP-003)
EU0020	Organic Chemical Transfer, South Rail Car Transfer Racks
EU0030	Boiler #1 - 8.375 mmBtu/hr Clever-Brooks natural gas fired boiler (EP-B01)
EU0040	Tank #27 - 815,000 Gallon Methanol Storage Tank (EP-027)

### EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source
1,100 Gallon Blend Tank
2,400 Gallon Blend Tank
950 Gallon Blend Tank in white room
4,000 Gallon Blend Tank in red room
4,300 Gallon Caustic Blend Tank
5,000 Gallon Neutralization Tank
1,200 Gallon Scrubber Waste Water Holding Tank
Tank #1 - 310,000 Gallon Caustic Storage Tank
Tank #2 - 310,000 Gallon Caustic Storage Tank
Tank #4 - 420,000 Gallon Empty Organic Chemical Storage Tank (EP-004)
Tank #5 - 380,000 Gallon Organic Chemical Storage Tank (EP-005)
Tank #6 - 380,000 Gallon Empty Organic Chemical Storage Tank (EP-006)
Tank #7 - 620,000 Gallon Organic Chemical Storage Tank (EP-007)

Tank #8 - 620,000 Gallon Caustic Storage Tank  
Tank #9 - 210,000 Gallon Caustic Storage Tank  
Tank #10 - 20,000 Gallon Caustic Storage Tank  
Tank #16 - 450,000 Gallon Organic Chemical Storage Tank (EP-016)  
Tank #22 - 50,000 Gallon Organic Chemical Storage Tank (EP-022)  
Tank #23 - 50,000 Gallon Empty Organic Chemical Storage Tank (EP-023)  
Tank #26 - 50,000 Gallon Empty Organic Chemical Storage Tank (EP-026)  
Tank #28 - 420,000 Gallon Caustic Storage Tank  
Tank #29 - 630,000 Gallon Empty Organic Chemical Storage Tank (EP-029)  
Tank #30 - 450,000 Gallon Caustic Storage Tank  
Tank #31 - 30,000 Gallon Organic Chemical Storage Tank (EP-031)  
Tank #32 - 30,000 Gallon Organic Chemical Storage Tank (EP-032)  
Tank #33 - 30,000 Gallon Organic Chemical Storage Tank (EP-033)  
Tank #34 - 30,000 Gallon Organic Chemical Storage Tank (EP-034)  
Tank #35 - 30,000 Gallon Organic Chemical Storage Tank (EP-035)  
Tank #36 - 20,000 Gallon Acetone Storage Tank  
Tank #37 - 20,000 Gallon Organic Chemical Storage Tank (EP-037)  
Tank #38 - 20,000 Gallon Organic Chemical Storage Tank (EP-038)  
Tank #39 - 20,000 Gallon Organic Chemical Storage Tank (EP-039)  
Tank #40 - 20,000 Gallon Organic Chemical Storage Tank (EP-040)  
Tank #41 - 20,000 Gallon Organic Chemical Storage Tank (EP-041)  
Tank #42 - 20,000 Gallon Organic Chemical Storage Tank (EP-042)  
Tank #43 - 20,000 Gallon Organic Chemical Storage Tank (EP-043)  
Tank #44 - 20,000 Gallon Organic Chemical Storage Tank (EP-044)  
Tank #45 - 20,000 Gallon Empty Chemical Storage Tank (EP-045)  
Tank #46 - 20,000 Gallon Empty Organic Chemical Storage Tank (EP-046)  
Tank #47 - 20,000 Gallon Organic Chemical Storage Tank (EP-047)  
Tank #48 - 20,000 Gallon Organic Chemical Storage Tank (EP-048)  
Tank #49 - 20,000 gallon Acetone Storage Tank  
Tank #50 - 20,000 Gallon Organic Chemical Storage Tank (EP-050)  
Tank #51 - 20,000 Gallon Organic Chemical Storage Tank (EP-051)  
Tank #52 - 20,000 Gallon Empty Organic Chemical Storage Tank (EP-052)  
Tank #53 - 20,000 Gallon Empty Organic Chemical Storage Tank (EP-053)  
Tank #54 - 20,000 Gallon Empty Organic Chemical Storage Tank (EP-054)  
Tank #55 - 11,600 Gallon Empty Organic Chemical Storage Tank (EP-055)  
Tank #56 - 20,000 Gallon Empty Organic Chemical Storage Tank (EP-056)  
Tank #57 - 20,000 Gallon Empty Organic Chemical Storage Tank (EP-057)  
Tank #58 - 12,000 Gallon Empty Organic Chemical Storage Tank (EP-058)  
Tank #59 - 12,000 Gallon Organic Chemical Storage Tank (EP-059)  
Tank #60 - 5,000 Gallon Empty Organic Chemical Storage Tank (EP-060)  
Tank #64 - 8,500 Gallon Organic Chemical Storage Tank (EP-064)  
Tank #65 - 15,000 Gallon Empty Organic Chemical Storage Tank (EP-065)  
Tank #85 - 12,000 Gallon Acid Storage Tank  
Tank #88 - 16,480 Gallon Acid Storage Tank  
Tank #90 - 10,000 Gallon Acid Storage Tank  
Tank #92 - 5,765 Gallon Acid storage Tank  
Organic Chemical Transfer, Truck Transfer Racks (EP-T01)  
Organic Chemical Transfer, North Rail Car Transfer Racks  
Organic Chemical Transfer, Barge Transfer Racks

Organic Chemical Transfer, Container Transfer Racks (EP-D01)

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) City of St. Louis Air Pollution Control Program Construction Permit No. 97-08-082;
- 2) City of St. Louis Air Pollution Control Program Construction Permit No. 97-05-051.

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

### Permit Condition PW001 10 CSR 10-6.065

#### Operating Permits

Voluntary Permit Condition, 10 CSR 10-6.065(6)(C)2.A

#### Emission Limitation:

- 1) This installation shall emit less than ten (10) tons of any individual hazardous air pollutant during any consecutive 12 month period.
- 2) This installation shall emit less than twenty five (25) tons of any combination of hazardous air pollutants during any consecutive 12 month period.

#### Monitoring/Recordkeeping:

- 1) The permittee shall maintain an accurate record of HAP's emitted into the atmosphere from the installation. The permittee shall use Attachment C, "Monthly Combined HAP Emission Tracking Record", and Attachment D, "Monthly Individual HAP Emission Tracking Record", or equivalent forms to verify compliance with the emission limitations listed above.
- 2) These records must be made available immediately for inspection to City of St. Louis and/or Department of Natural Resources' personnel upon request.

#### Reporting:

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

### Permit Condition PW002 10 CSR 10-5.500<sup>1</sup>

#### Control of Emissions from Volatile Organic Liquid Storage Compliance Plan

#### Required Activities and Time Line:

- 1) The permittee shall determine and complete all bids for tank cleaning, potential repairs, seal replacements and American Petroleum Institute (API) inspections for Tank #27 in January to February 2006.
- 2) The tank cleaning for Tank #27 shall be completed by March 30, 2006.
- 3) The completion of any additional repairs and the installation of a replacement seal on Tank #27 shall be done between April and May, 2006.
- 4) The API inspection of the tank floor and walls shall be completed for Tank #27 by June 30, 2006.
- 5) The completion of the transfer of methanol into Tank #27 from Tank #29 shall be done by July 30, 2006.

<sup>1</sup> A compliance plan was required because methanol is being stored in an uncontrolled 630,000 gallon storage tank, Tank #29. Due to the maximum true vapor pressure of the VOL being stored and the capacity of the tank the requirements of 10 CSR 10-5.500 are applicable. To comply with this regulation this plant wide condition requires that the methanol be moved to an 815,000 gallon storage tank, Tank #27, which has an existing internal floating roof. This plant-wide condition gives a time table on the processes required to carry out the task of moving the VOL to a different storage tank.

**Recordkeeping:**

The permittee shall keep records indicating the dates of when each compliance plan activity is completed.

**Reporting:**

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 in writing when each phase of the compliance plan is completed.
- 2) The permittee shall report any tank deficiencies discovered during the API inspection of the tank floor and walls to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 within 10 days.



### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

<b>EU0010</b> <b>Aviation Fuel Storage Tank</b>	
General Description:	Tank #3 – 221,000 gallon storage tank with an internal floating roof. Tank was modified to install the floating roof in 1997.
Manufacturer/Model #:	Unknown
EQ Reference # (2003):	EP-003

<b>Permit Condition EU0010-001</b> <b>10 CSR 10-5.220</b> <b>Control of Petroleum Liquid Storage, Loading and Transfer</b>
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**Operational Limitation/Equipment Specifications:**

- 1) The permittee shall not cause or permit the storage in any stationary storage tank of more than 40,000 gallons capacity of any petroleum liquid having a true vapor pressure of 1.5 pounds per square inch absolute (psia) or greater at 90 degrees Fahrenheit (90°F), unless the storage tank is equipped with:
  - a) A floating roof, consisting of an internal floating cover that rests on the surface of the liquid contents and is equipped with a closure seal(s) to close the space between the roof edge and tank wall. Storage tanks with external floating roofs shall meet the additional following requirements:
- 2) Control equipment described in 10 CSR 10-5.220(3)(A)1. shall not be allowed if the petroleum liquid other than gasoline has a true vapor pressure of 11.1 psia or greater at 90°F. All storage tank gauging and sampling devices shall be gas-tight except when gauging or sampling is taking place.

**Monitoring/Recordkeeping:**

The permittee shall maintain written records of maintenance (both routine and unscheduled) performed on the tanks, all repairs made, the results of all tests performed and the type and quantity of petroleum liquid stored in them (see Attachment A). The records shall be maintained for five (5) years and made available to the staff director upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<b>Permit Condition EU0010-002</b> <b>10 CSR 10-6.070</b> <b>New Source Performance Regulations</b> <b>40 CFR Part 60 Subpart Kb</b> <b>Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984</b>
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**Operational Limitation/Equipment Specifications:**

- 1) The owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or

with a design capacity greater than or equal to  $75 \text{ m}^3$  but less than  $151 \text{ m}^3$  containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa, shall equip each storage vessel with one of the following: [§60.112b(a)]

- a) A fixed roof in combination with an internal floating roof meeting the following specifications: [§60.112b(a)(1)]
  - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [§60.112b(a)(1)(i)]
  - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [§60.112b(a)(1)(ii)]  
(1) A foam-or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam-or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - iii. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [§60.112b(a)(1)(iii)]
  - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [§60.112b(a)(1)(iv)]
  - v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [§60.112b(a)(1)(v)]
  - vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [§60.112b(a)(1)(vi)]
  - vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [§60.112b(a)(1)(vii)]
  - viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [§60.112b(a)(1)(viii)]
  - ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [§60.112b(a)(1)(ix)]

### **Testing and Procedures:**

- 1) After installing the control equipment required to meet §60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall: [§60.113b(a)]
  - a) Visually inspect the internal floating roof, the primary seal, and the secondary seal, prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [§60.113b(a)(1)]
  - b) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [§60.113b(a)(2)]
  - c) Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the

primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) and (a)(3)(ii) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) of this section. [§60.113b(a)(4)]

- d) Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling. [§60.113b(a)(5)]

### **Monitoring:**

- 1) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 5 years. The record required by paragraph (b) of this section will be kept for the life of the source. [§60.116b(a)]
- 2) The owner or operator of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [§60.116b(b)]
- 3) Except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [§60.116b(c)]
- 4) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [§60.116b(e)]
  - a) For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [§60.116b(e)(1)]
  - b) For crude oil or refined petroleum products the vapor pressure may be obtained by the following: [§60.116b(e)(2)]
    - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [§60.116b(e)(2)(i)]
    - ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa. [§60.116b(e)(2)(ii)]
  - c) For other liquids, the vapor pressure: [§60.116b(e)(3)]
    - i. May be obtained from standard reference texts, or [§60.116b(e)(3)(i)]
    - ii. Determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17); or [§60.116b(e)(3)(ii)]
    - iii. Measured by an appropriate method approved by the Administrator; or [§60.116b(e)(3)(iii)]
    - iv. Calculated by an appropriate method approved by the Administrator. [§60.116b(e)(3)(iv)]

### **Reporting/Recordkeeping:**

- 1) After installing control equipment in accordance with §60.112b(a)(1) (fixed roof and internal floating roof), the owner or operator shall meet the following requirements. [§60.115b(a)]

- a) Furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3). [§60.115b(a)(1)]
- b) Keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [§60.115b(a)(2)]
- c) If any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [§60.115b(a)(3)]
- d) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. [§60.115b(a)(4)]

**Permit Condition EU0010-003**

10 CSR 10-6.060

**Construction Permits Required**

City of St. Louis Air Pollution Control Program Construction Permit No. 97-08-082

**Emission Limitation:**

The throughput of aviation gasoline shall be limited to no more than 1.44 million gallons in any consecutive twelve (12)-month period.

**Equipment Specification:**

Storage Tank No. 3 shall comply with 10 CSR 10-5.220(3)(A)1. by installing an internal floating roof.

**Monitoring/Recordkeeping/Reporting:**

- 1) Monthly records of the aviation gasoline throughput shall be maintained, along with a consecutive twelve (12)-month total per month. (Attachment E)
- 2) Monthly records of truck loading throughput of aviation gasoline shall be maintained. (Attachment E)
- 3) Records of maintenance and spills or leakage shall be kept. All spills and leakages of more than twenty (20) gallons shall be reported to this Program as soon as practicable, but no more than 24 hours after occurrence.
- 4) The permittee shall report any deviation from monitoring, recordkeeping, and reporting requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**EU0020**

**South Rail Car Transfer Racks**

General Description:	Rail car transfer racks used to unload organic chemicals from tank cars
Manufacturer/Model #:	Unknown
EIQ Reference # (2003):	N/A

**Permit Condition EU0020-001**

10 CSR 10-6.060

**Construction Permits Required**

City of St. Louis Air Pollution Control Program Construction Permit No. 97-05-051

**Emission Limitation:**

The hours of operation of the south rail car transfer rack shall not exceed 2600 hours in any consecutive twelve (12)-month period.

**Monitoring:**

- 1) Pump equipment shall be operated and maintained according to the manufacture's instructions.
- 2) Periodic pump inspections shall be made for leaks.

**Recordkeeping/Reporting:**

- 1) Monthly records for hours of operation shall be kept, including a calculated total for any consecutive twelve (12)-month period. (Attachment F)
- 2) Monthly records of pump inspections, maintenance, and repairs shall be kept. (See Attachment H)
- 3) Any malfunction or condition of upset when emissions are released in more than their normal amount shall be reported to the City of St. Louis Air Pollution Control Program as soon as possible.
- 4) The permittee shall report any deviation from monitoring, recordkeeping, and reporting requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**EU0030**

**Natural Gas Boiler**

General Description:	Boiler #1, 8.375 MMBtu/hr natural gas boiler
Manufacturer/Model #:	Cleaver-Brooks
EIQ Reference # (2003):	EP-B1

**Permit Condition EU0030-001**

10 CSR 10-5.030

**Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating**

**Emission Limitation:**

The permittee shall not emit particulate matter (PM) in excess of 0.60 pounds of particulate matter per million BTU of heat input from emission unit EU0460.

**Equipment and Operation Parameters:**

The emission unit shall be limited to burning pipeline grade natural gas only.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain potential to emit calculations in terms of pounds of particulate matter per million BTU of heat input for the fuel type burned in this emission unit (See Attachment I).
- 2) These records must be made available immediately for inspection to City of St. Louis and/or Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

**Permit Condition EU030-002**

10 CSR 10-6.260<sup>2, 3</sup>

**Restriction of Emission of Sulfur Compounds**

**Emission Limitation:**

No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

[10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards]

<u>Pollutant</u>	<u>Concentration by Volume</u>	<u>Remarks</u>
1) Sulfur Dioxide (SO <sub>2</sub> )	0.03 parts per million (ppm)	Annual arithmetic mean
	0.14 ppm (365 micrograms per cubic meter (µg/m <sup>3</sup> ))	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m <sup>3</sup> )	3-hour average not to be exceeded more than once per year
2) Hydrogen Sulfide (H <sub>2</sub> S)	0.05 ppm (70 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m <sup>3</sup> )	½-hour average not to be exceeded over 2 times in any 5 consecutive days
3) Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> )	10 µg/m <sup>3</sup>	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m <sup>3</sup>	1-hour average not to be exceeded more than once in any 2 consecutive days

**Equipment and Operational Parameters**

The emission unit shall be limited to burning pipeline grade natural gas only.

**Monitoring/Recordkeeping:**

- 1) Documentation supporting the fuel used is natural gas shall be maintained. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type will be acceptable.
- 2) These records shall be made available immediately for inspection to the City of St. Louis/Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<sup>2</sup> 10 CSR 10-6.260(3)(B) is a state-only requirement

<sup>3</sup> The current version of 10 CSR 10-6.260 (May 30, 2004, effective date) exempts combustion equipment that exclusively uses pipeline grade natural gas or liquefied petroleum gas, or any combination of these fuels, from the requirements of this rule. Therefore, when the provisions of the current version of 10 CSR 10-6.260 are incorporated into the federally approved SIP as a final EPA action, the emission units would not be subject to 10 CSR 10-6.260 and this permit condition will no longer be an applicable requirement in this operating permit.

EU0040 Methanol Storage Tank	
General Description:	Tank #27 – 815,000 gallon storage tank with an internal floating roof.
Manufacturer/Model #:	Unknown
EQ Reference # (2003):	EP-27

**Permit Condition EU0040-001**

**10 CSR 10-5.500**

**Control of Emissions From Volatile Organic Liquid Storage**

- 1) The permittee shall reduce VOC emissions from storage tanks as follows:
  - a) Each fixed roof tank shall be equipped with an internal floating roof that meets the following specifications.
    - i. The internal floating roof shall rest or float on the liquid surface but not necessarily in complete contact with it inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying or refilling shall be continuous and shall be accomplished as rapidly as possible;
    - ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
      - (1) A liquid-mounted seal;
    - iii. Each opening in a non-contact internal floating roof except for automatic bleeder vents such as vacuum breaker vents and the rim space vents shall provide a projection below the liquid surface;
    - iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells and stub drains shall be equipped with a cover or lid which is to be maintained in a closed position at all times with no visible gap except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use;
    - v. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports;
    - vi. Rim space vents shall be equipped with a gasket and shall be set to open only when the internal floating roof is not floating or at the manufacturer's recommended settings.
    - vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90% of the opening; and
    - viii. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover;

**Performance Testing:**

The permittee shall comply with the requirements of 10 CSR 10-5.500(3)(C)1..

- 1) After installing the control equipment necessary for the source to comply with 10 CSR 10-5.500(3)(A)1.. for permanently affixed roofs and internal floating roofs, the permittee shall:
  - a) Visually inspect the internal floating roof, the primary seal, and secondary seal prior to filling the storage vessel with VOL. If there are holes, tears or other openings in the primary seal, the secondary seal or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel;
  - b) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or secondary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or if there is liquid accumulated on the roof, or if the seal is detached, or if there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in 10 CSR 10-5.500(3)(C) cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, the permittee may request a 30-day extension from the department in the inspection report required in 10 CSR 10-5.500(4)(A)2.. Such a request for an

extension must document that alternate storage capacity is unavailable and specify a schedule of actions the permittee will take that will assure that the control equipment will be repaired or the vessel will be emptied within 30 days; (10 CSR 10-5.550(3)(C)1.B.)

- c) Visually inspect the internal floating roof, the primary seal, secondary seal, gaskets, slotted membranes and sleeve seals if any each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears or other openings in the seal, or if the seal fabric or the secondary seal has holes, tears or other openings in the seal, or if the seal fabric or the gaskets no longer close off the liquid surfaces from the atmosphere, or if the slotted membrane has more than 10% open area, the permittee shall repair the items as necessary so that none of the conditions specified in 10 CSR 10-5.550(3)(C) exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels subject to the annual inspection as specified in 10 CSR 10-5.50(3)(C)1.B. and 10 CSR 10-5.500(3)(C)1.C.(II) and at intervals no greater than five years in the case of vessels specified in 10 CSR 10-5.550(3)(C)1.C.(I).
- d) Notify the department in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 10 CSR 10-5.500(3)(C)1.A. and (3)(C)1.D. to afford the department the opportunity to have an observer present. If the inspection required by 10 CSR 10-5.500(3)(C)1.D. is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the department at least seven days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the department at least seven days prior to refilling.

#### **Test Methods:**

- 1) Compliance with the requirements of 10 CSR 10-5.500 shall be determined by applying the following test methods, as appropriate:
  - a) Test Methods 1 and 2 (40 CFR 60, Appendix A) for determining flow rates, as necessary;
  - b) Test Method 18 (40 CFR 60, Appendix A) for determining gaseous organic compound emissions by gas chromatography;
  - c) Test Method 21 (40 CFR 60, Appendix A) for determination of volatile organic compound leaks;
  - d) Test Method 22 (40 CFR 60, Appendix A) for visual determination of fugitive emissions from material sources and smoke emissions from flares;
  - e) Test Method 25 (40 CFR 60, Appendix A) for determining total gaseous nonmethane organic emissions as carbon;
  - f) Test Method 25A or 25B (40 CFR 60, Appendix A) for determining total gaseous organic concentrations using flame ionization or nondispersive infrared analysis;
  - g) Test Method described in 40 CFR 60.113(a)(ii) for measurement of storage tank seal gap;
  - h) Determination of true vapor pressure using American Society for Testing and Materials (ASTM) Test Methods D323-94, D4953, D5190 or D5191 for the measurement of Reid vapor pressure; and
  - i) Other test methods for determining compliance may be used if found to be equivalent after review by the department.

#### **Monitoring:**

- 1) Available data on the storage temperature may be used to determine the maximum true vapor pressure.
  - a) For vessels operated above or below ambient temperature, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
  - b) For other liquids, the vapor pressure shall be determined by an appropriate test method in 10 CSR 10-5.500(5) or calculated by an appropriate method approved by the department.

#### **Recordkeeping:**

- 1) The permittee shall maintain all records required by 10 CSR 10-5.500(4), except for the records required by 10 CSR 10-5.500(4)(F), on-site for at least five years. The records required by 10 CSR 10-5.500(4)(F) shall be kept on-site for the life of the source. The records shall be made available to the department immediately upon request.



- 2) The permittee shall:
  - a) Keep a record of each inspection performed as required by 10 CSR 10-5.500(3)(C)1.A., (3)(C)1.B. (3)(C)1.C., and (3)(C)1.D. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment including seals, internal floating roof, and fittings. (See Attachment G)
- 3) The permittee shall maintain readily accessible records of the dimensions of the storage vessel and an analysis of the capacity of the storage vessel.
- 4) The permittee shall maintain a record of the VOL storage, the period of storage and the maximum true vapor pressure of the VOL during the respective storage period. (See Attachment B)

**Reporting:**

- 1) If any of the conditions of 10 CSR 10-5.500(3)(C)1.B. are detected during the annual visual inspection required by 10 CSR 10-5.500(3)(C)1.B., report to the City of St. Louis Air Pollution Control Program within 20 days after the inspection, the identity of the storage vessel, the nature of the defects and the date the storage vessel was emptied or the nature of and date the repair was made; and
- 2) After each inspection required by 10 CSR 10-5.500(3)(C)1.C. where tears or holes in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 10 CSR 10-5.500(3)(C)1.C.(II) are discovered, report to the department within 20 days after the inspection the identity of the storage vessel and the reason it did not meet the specifications of 10 CSR 10-5.500(3)(A)1., (3)(A)2. or (3)(C)1., and list each repair made.
- 3) The permittee shall report any deviation from any of the requirements of this permit condition using the semi-annual monitoring report and annual compliance certification to the City of St. Louis Air Pollution Control Program, 1415 North 13<sup>th</sup> Street, St. Louis, MO 63106-4424 and Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

## **IV. Core Permit Requirements**

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

### **10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions**

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph (a.) information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (a.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

### **10 CSR 10-6.060, Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

**10 CSR 10-6.065, Operating Permits**

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

**10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 3) The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

**10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

**10 CSR 10-6.150, Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

**10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**10 CSR 10-6.180, Measurement of Emissions of Air Contaminants**

- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the

source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-5.040, Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

#### **St. Louis City Ordinance 65645, Sec 15, Open Burning Restrictions**

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

#### **10 CSR 10-5.160, Restriction of Emission of Odors**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

**Residential, recreational, institutional, retail sales, hotel or educational premises.**

- 1) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or

**Premises other than those in paragraphs (1)A.1. and (2) of the rule when air containing odorous matter is diluted with four or more volumes of odor-free air.**

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

**This requirement is not federally enforceable.**

#### **10 CSR 10-5.240, Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.

- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

**10 CSR 10-6.100, Alternate Emission Limits**

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

**10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants**

**40 CFR Part 61 Subpart M, National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

**10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

#### **10 CSR 10-6.280, Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
- a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
- a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";
    - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

### Permit Duration

10 CSR 10-6.065(6)(C)1.B.

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### General Recordkeeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

#### 1) Recordkeeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

#### 2) Reporting

- a) The permittee shall submit a report of all required monitoring by:
  - i) October 1st for monitoring which covers the January through June time period, and
  - ii) April 1st for monitoring which covers the July through December time period.
  - iii) Exception: Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- b) Each report must identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- c) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
  - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
  - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
  - iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
  - iv) These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

#### **Risk Management Plans Under Section 112(r)**

10 CSR 10-6.065(6)(C)1.D.

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

#### **Severability Clause**

10 CSR 10-6.065(6)(C)1.F.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

#### **General Requirements**

10 CSR 10-6.065(6)(C)1.G

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.



### **Incentive Programs Not Requiring Permit Revisions**

10 CSR 10-6.065(6)(C)1.H

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

### **Compliance Requirements**

10 CSR 10-6.065(6)(C)3.

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1<sup>st</sup>, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5<sup>th</sup> Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification,
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation,
  - c) Whether compliance was continuous or intermittent,
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

### **Permit Shield**

10 CSR 10-6.065(6)(C)6.

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit; or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The administrator's authority to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

### **Emergency Provisions**

10 CSR 10-6.065(6)(C)7.

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

### **Operational Flexibility**

10 CSR 10-6.065(6)(C)8.

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program and the Administrator at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program and to the Administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, The permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

#### **Off-Permit Changes**

10 CSR 10-6.065(6)(C)9.

- 1) Except as noted below, The permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; The permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

#### **Responsible Official**

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by Fred Nichols, Safety Director. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

### **Reopening Permit For Cause**

10 CSR 10-6.065(6)(E)6.

In accordance with 10 CSR 10-6.065(6)(E)6.A., this permit may be reopened with cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

### **Statement of Basis**

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## Attachment A

This attachment may be used to help meet the recordkeeping requirements of Permit Condition: EU0010-001.

[illegible]

## Attachment B

This attachment may be used to help meet the recordkeeping requirements of Permit Condition: EU0040-001.

[illegible]

## Attachment C

## Sample Record Form

## Compliance Demonstration Form Under Permit Condition PW-001

## Monthly Combined HAP Emission Tracking Record

[illegible]

<sup>1</sup> Total Plant Usage

<sup>2</sup> HAP emission factor obtained from AP-42, FIRE, or Mass Balance (include documentation)

<sup>3</sup> Column D = Column B x Column C

<sup>4</sup> Column E = Previous 11 months' Column D + current Column D (total of less than twenty-five indicates compliance)

## Monthly Individual HAP Emission Tracking Record

HAP Name: \_\_\_\_\_ CAS No.: \_\_\_\_\_

[illegible]

- 1 Total Plant Usage  
2 Individual HAP emission factor obtained from AP-42, FIRE, or Mass Balance (include documentation)  
3 Column D = Column B x Column C  
4 Column E = Previous 11 months' Column D + current Column D (total of less than twenty-five indicates compliance)



## Attachment E

This attachment may be used to help meet the recordkeeping requirements of Permit Condition: EU0010-003.

[illegible]

## Attachment F

This attachment may be used to help meet the recordkeeping requirements of Permit Condition: EU0020-001.

[illegible]

## Attachment G

This attachment may be used to help meet the recordkeeping requirements of Permit Condition: EU0040-01.

[illegible]

## Attachment H

This attachment may be used to help meet the recordkeeping requirements of Permit Condition: EU0020-001.

[illegible]

## Attachment I

This attachment may be used to demonstrate compliance with 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

The emission limit for EU0030 (new, i.e. installed after 02/15/79) is 0.40 lbs PM per million BTUs of heat input. This is the maximum allowable emission rate for new sources at an installation of indirect heating sources with a heat input rate of less than ten (10) million BTUs per hour.

The following equipment was used to obtain the total heat input (Q) for the above equation:

Equipment	Heat Input (mmBtu/hr)
Natural Gas Boiler (EU0460)	8.375
<b>TOTAL</b>	<b>8.375</b>

The following table demonstrates compliance with the emission limit:

Emission Rate (lb/mmBtu) = MHDR\*Emission Factor/Heat Capacity (mmBtu/hr)

Emission Unit #	Heat Capacity (MMBtu/hr)	Maximum Hourly Design Rate (10 <sup>6</sup> scf)	PM Emission Factor (lb/10 <sup>6</sup> scf)	Emission Factor Reference	Potential Emission Rate (lb/MMBtu)	Emission Rate Limit (lb/MMBtu)	Unit in Compliance? (Yes/No)
EU0030	8.375	0.0022	7.6	AP-42 - Ch. 1	0.0075	0.60	Yes

## STATEMENT OF BASIS

### Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received December 22, 2005; revised March 3, 2005
- 2) 2003 Emissions Inventory Questionnaire, received March 26, 2004;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) U.S. EPA document, FIRE, *Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants*, Version 6.23.

### Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule has been included in the operating permit because the exemption for natural gas combustion in the current version (May 30, 2004, effective date) of this rule has not been incorporated into the federal State Implementation Plan (SIP). Therefore, the old version of the rule that does not contain an exemption for natural gas combustion is still enforceable until the new version of the sulfur rule is adopted in the federal SIP.

2) 10 CSR 10-6.100, *Alternate Emission Limits*

This rule has been included in the operating permit in order to provide citing for the allowance of requests for alternate emission limits. This citing provides the information necessary to know that an alternate emission limit must be placed in a permit before the alternate emission limit may become effective.

3) 10 CSR 10-5.240, *Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area,*

This rule has been included in the operating permit as per policy of MDNR for every source within the St. Louis Metropolitan Area.

### Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

1) 10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations,*

This installation does not have a solvent clean up operation covered by this rule. The rule states that the provisions of this rule shall not apply to any stationary source at which cleaning solvent VOCs are emitted at a rate less than five hundred (500) pounds per day. This installation emits less than five hundred (500) pounds per day of cleaning solvent VOCs.

2) 10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions from Existing Major Sources,*

This rule is not applicable to this installation since the rule states that if an installation is affected by any federal rulemaking promulgated under 40 CFR part 60, 40 CFR part 61, or 40 CFR part 63 that applies to VOC emissions from a product process, or a raw material, intermediate or product tank then it would not be subject to this regulation. This installation is regulated under 40 CFR part 60 Subpart Kb. In addition, the rule also states that it does not apply to any installation that is subject to one or more rules under Title 10, Division 10, Chapter 5 of the *Code of State Regulations* (CSR) that apply to VOC emissions from product tanks. Tanks at this installation are subject to 10 CSR 10-5.500.

### **Construction Permit Revisions**

The following revisions were made to construction permits for this installation:

- 1) City of St. Louis Construction Permit No. 95-07-083 and Construction Permit No. 99-08-063 were terminated as of April 21, 2005 and are no longer in affect. The equipment permitted under these permits was either removed from the installation, never needed to be permitted, or was never installed as indicated in the permit.
- 2) City of St. Louis Construction Permit No. 97-05-051 contains a requirement in the recordkeeping section of the permit that requires all records to be kept for a minimum of two years. This condition was not included in the operating permit because the current operating rule, 10 CSR 10-6.065 requires records to be kept for at least five years.

### **NSPS Applicability**

- 1) 40 CFR Part 60, Subpart D, Da, Db, nor Dc apply to the steam generation unit at this installation since the steam generation unit has a maximum heat input that is less than the applicability thresholds of these various subparts.
- 2) 40 CFR Part 60, Subpart K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978*. The provisions of this subpart only apply to petroleum storage tanks that were constructed, reconstructed or modified after June 11, 1973 and prior to May 19, 1978. All of the tanks at this installation were installed before 1967 except for Tank #3 (EU0010). Tank #3 stores petroleum liquid and was modified in 1997, which is after May 19, 1978, therefore it is not subject to the provisions of this subpart.
- 3) 40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984*. The provisions of this subpart only apply to petroleum storage tanks that were constructed, reconstructed or modified after May 18, 1978 and prior to July 23, 1984. All of the tanks at this installation were installed before 1967 except for Tank #3. Tank #3 stores petroleum liquid and was modified in 1997, which is after July 23, 1984, therefore it is not subject to the provisions of this subpart.
- 4) 40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Storage Vessels for (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*. The provisions of this subpart only apply to VOL storage tanks that were constructed, reconstructed or modified after May 18, 1978 and prior to July 23, 1984. All of the tanks at this installation were installed before 1967 except for Tank #3. Tank #3 stores petroleum liquid and was modified in 1997, which is after

July 23, 1984, and is therefore subject to the provisions of this subpart. This tank contains a refined petroleum product called aviation gasoline which has a maximum true vapor pressure of 49 kPa. The tank complies with this subpart by utilizing an internal floating roof with a liquid mounted seal. The operating permit does not include requirements for other control devices since the installation uses a liquid mounted seal to comply with this regulation. Tank #27 (EU0040) will be repaired and will be fitted with a replacement seal before it is filled with methanol as required by the compliance plan in Permit Condition PW003 for 10 CSR 10-5.500. This activity would not trigger the requirements of this regulation because these activities would not constitute a modification or reconstruction as defined in 40 CFR Part 60. Tank #27 was installed in 1967, well before the applicability date of Subpart Kb.

### **MACT Applicability**

- 1) 40 CFR Part 63, Subpart EEEE, *Organic Liquid Distribution (non-gasoline)*, This regulation applies to organic liquid distribution installations that are major sources of HAPs. In this permit the installation has requested a federally enforceable limit on the Hazardous Air Pollutant (HAP) emissions from the installation. Permit Condition PW002 restricts the installation's emissions to less than 25 tons/yr of any combination of HAPs and less than 10 tons/yr of any individual HAP. The installation requested this limitation to be included in the Part 70 Operating Permit prior to the compliance date of the MACT, which is December 11, 2006. Since the installation will not be classified as major for HAPs this MACT would not apply to the installation.
- 2) 40 CFR Part 63, Subpart H, *Organic Hazardous Air Pollutants for Equipment Leaks*, This rule was marked as applicable in the application. However, this subpart is only applicable to installations that are subject to other subparts of part 63 that reference this subpart. This installation is not subject to any subparts that reference this subpart.
- 3) 40 CFR Part 63, Subpart OO, *Tanks – Level 1*, This rule was marked as applicable in the application. However, this subpart is only applicable to installations that are subject to other subparts of part 63 that reference this subpart. This installation is not subject to any subparts that reference this subpart.
- 4) 40 CFR Part 63, Subpart DDDDD, *Industrial, Commercial and Institutional Boilers and Process Heaters*, This rule is applicable to any installation which operates an industrial, commercial, or industrial boiler that is classified as major for HAPs. However, in this permit the installation has requested a federally enforceable limit on the Hazardous Air Pollutant (HAP) emissions from the installation. Permit Condition PW002 restricts the installation's emissions to less than 25 tons/yr of any combination of HAPs and less than 10 tons/yr of any individual HAP. The installation requested this limitation to be included in the Part 70 Operating Permit prior to the compliance date of the MACT, which is September 13, 2007. Since the installation will not be classified as major for HAPs this MACT would not apply to the installation.

### **NESHAP Applicability**

- 1) 40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition parts of the subpart which makes the subpart applicable to all sources. It is included as a core permit requirement.

### **CAM Applicability**

The installation does not have any emission units that are subject to any emission limitations or standards that were proposed by the EPA administrator after November 15, 1990 pursuant to section 111 or 112 of the Clean Air Act. Therefore, CAM would not apply to this installation.



### Other Regulatory Determinations

1) 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

For 10 CSR 10-5.030, emission limitations were calculated as follows:

The PM emission limitation for existing sources (installed on or before February 15, 1979 ) is 0.60 pounds per million BTUs of heat input if the total heat input at the installation is less than ten (10) million BTUs per hour. The only indirect heating unit at the installation is a 8.375 million BTUs per hour boiler (installed prior to 1967), so the total heat input at the installation is 8.375 million BTUs per hour. The installation operates the following fuel burning equipment used for indirect heating:

#### Natural Gas Burning Indirect Heating Sources

Emission Unit	Heat Input (MMBtu/hr)	Maximum Hourly Design Rate (MMCF/hr)	PM Emission Factor * (lb/MMCF)	PM Potential Emission Rate (lb/MMBtu)	PM Allowable Emission Rate (lb/MMBtu)
Natural Gas Boiler	8.375	0.0082	7.6	0.0075	0.60

\*AP-42, Section 1.4 Natural Gas Combustion

2) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

This rule is applicable to the 8.375 MMBtu/hr natural gas boiler (EU0460) but based on a decision/agreement between EPA Region VII, Air Pollution Control Program Enforcement, and Air Pollution Control Program Permitting Section, 10 CSR 10-6.220 is not being included in Title V permits for natural gas combustion units because by the nature of the fuel no opacity exceedances would ever be expected under normal operating conditions.

3) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule applies to the Natural Gas Boiler (EU0460). This boiler uses only pipeline grade natural gas as a source of fuel and has a maximum heat input less than 10 MMBTU/hr. Compliance with this rule is to be shown either from stack testing or by proving the sulfur content is less than 0.5%. The boiler at this installation only burn natural gas and would never be expected to exceed the emission limits of this rule due to the low emissions of sulfur compounds from natural gas combustion.

4) 10 CSR 10-5.220, *Control of Petroleum Liquid Storage, Loading and Transfer*

This installation is subject to this regulation since the installation operates a tank that contains aviation gasoline. This installation stores this liquid and loads it into trucks. The provisions for petroleum storage tanks are included in this operating permit while the provisions for gasoline loading are not included. This installation is not subject to the requirements of 10 CSR 10-5.220(4) for gasoline loading. Section 4 of this regulation does not apply to a loading operation that has an average monthly throughput of gasoline less than or equal to 120,000 gallons when averaged over the most recent calendar year, provided that the installation loads gasoline by submerged loading. In order to maintain this exemption the installation must submit a report by February 1<sup>st</sup> of each year, stating the gasoline throughput for each month of the previous calendar year and must keep records of gasoline throughput and gasoline delivery. This installation loads using submerged loading, maintains the required records and submits a report each year with the all of the information required to maintain the exemption from the gasoline loading requirements in 10 CSR 10-5.220(4). As long as the average monthly throughput of gasoline is less than or equal to 120,000 gallons, and the installation maintains the required records and submits reports with all of the information required, the installation will not be subject to the gasoline loading requirements of this rule. The installation complies with 10 CSR 10-5.220(3) for Petroleum Storage Tanks by utilizing an internal floating roof that is equipped with closure seals used to close the space between the roof edges and the tank wall. Only the

requirements for an internal floating roof were included in the operating permit, since that is what the installation uses to comply with the regulation.

5) 10 CSR 10-5.500, *Control of Emissions From Volatile Organic Liquid Storage*

This installation has tanks that are subject to this rule. This rule states that it is applicable to any tank with a capacity that is greater than or equal to 40,000 gallons storing a VOL with a maximum true vapor pressure greater than or equal to 0.5 psia. Any vessels already regulated under or exempt from the requirements of 40 CFR parts 60, 61, or 63 are not subject to this rule. Any vessels used to only to store or transfer petroleum that are subject to the requirements of 10 CSR 10-5.220 are not subject to this rule. Therefore, Tank #3 (EU0010) would not be subject to this rule since it is already regulated by 40 CFR part 60 subpart Kb and the requirements of 10 CSR 10-5.220. Tank #3 is used solely to store and transfer aviation gasoline from railcars at this installation. Tank #27 (EU0040) is going to be used to store methanol in place of Tank #29. The capacity of the Tank #27 is 815,000 gallons and the maximum true vapor pressure of methanol is 3.12 psia. Based on these properties, Tank #27 is subject to the requirements of 10 CSR 10-5.500. A compliance plan is included in the permit as a plant wide condition, because at the time of the application the installation was not in compliance with this regulation. This compliance plan outlines the procedure to start storing methanol in Tank #27 instead of Tank #29. Tank #27 has an existing internal roof, while Tank #29 does not have any of the required controls for this regulation. Tank #27 complies with this regulation by utilizing the existing internal floating roof with a liquid mounted seal. The operating permit does not include requirements for other control devices since installation uses a liquid mounted seal to comply with this regulation. The storage tanks listed in the emission units with out limitations section are not subject to this rule based on determinations made in the following table:

EQ Point No.	Tank Description	Year installed	Subject to 10 CSR 10-5.500
EP-001	310,000 gallon; Caustic Potash (KOH) tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-002	310,000 gallon; Liquid Caustic Soda (NaOH) tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-003	221,000 gallon; Aviation Gasoline tank	1997	Tank is currently regulated by 40 CFR Subpart Kb. Not subject per 10 CSR 10-5.500(1)(B)7.
EP-004	420,000 gallon; empty organic chemical tank	pre-1967	No liquid stored. Not subject to 10 CSR 10-5.500
EP-005	380,000 gallon; mineral spirit tank	pre-1967	Vapor pressure is 0.08 psia. Vapor pressure < 0.5 psia. Not subject per 10 CSR 10-5.500(1)(B)1.
EP-006	380,000 gallon; empty organic chemical tank	pre-1967	No liquid stored. Not subject to 10 CSR 10-5.500
EP-007	620,000 gallon; mineral spirit tank	pre-1967	Vapor pressure is 0.08 psia. Vapor pressure < 0.5 psia. Not subject per 10 CSR 10-5.500(1)(B)1.
EP-008	620,000 gallon; Liquid Caustic Soda (NaOH) tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-009	210,000 gallon; Caustic Potash (KOH) tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-010	20,000 gallon; Caustic Potash (KOH) tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-016	450,000 gallon; mineral spirit tank	pre-1967	Vapor pressure is 0.08 psia. Vapor pressure < 0.5 psia. Not subject per 10 CSR 10-5.500(1)(B)1.
EP-022	50,000 gallon; Shell Solvent 142 HT tank	pre-1967	Vapor pressure is 0.025 psia. Vapor pressure < 0.5 psia. Not subject per 10 CSR 10-5.500(1)(B)1.
EP-023	50,000 gallon; empty organic chemical tank	pre-1967	No liquid stored. Not subject to 10 CSR 10-5.500
EP-026	50,000 gallon; empty organic chemical tank	pre-1967	No liquid stored. Not subject to 10 CSR 10-5.500
EP-027	270,000 gallon; empty organic chemical tank	pre-1967	No liquid stored. Not subject to 10 CSR 10-5.500
EP-028	420,000 gallon; Liquid Caustic Soda (NaOH) tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-029	630,000 gallon; empty organic chemical tank	1974	No liquid stored. Previously stored methanol. Not subject to 10 CSR 10-5.500
EP-030	450,000 gallon; Liquid Caustic Soda (NaOH)	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500

	tank		
EP-031	30,000 gallon; MEK tank	1978	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-032	30,000 gallon; Xylene tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-033	30,000 gallon; Toluene tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-034	30,000 gallon; IPA tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-035	20,000 gallon; Mineral Seal Oil tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-036	20,000 gallon; Acetone tank	pre-1967	Not considered a VOL. Not subject to 10 CSR 10-5.500
EP-037	20,000 gallon; Chem Solvent EE Acetate tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-038	20,000 gallon, empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-039	20,000 gallon, empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-040	20,000 gallon, empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-041	20,000 gallon; Ethyl Acetate tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-042	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-043	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-044	20,000 gallon; n-Hexane tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-045	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-046	20,000 gallon; S.D. Alcohol 3C tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-047	20,000 gallon; n-Butyl Acetate tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-048	20,000 gallon; Heptane C tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-049	20,000 gallon; Acetone tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-050	20,000 gallon; Hexane tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-051	20,000 gallon; Toluene tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-052	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-053	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-054	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-055	11,600 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-056	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-057	20,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-058	12,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500

EP-059	12,000 gallon; S.D. Alcohol 3A	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-060	5,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-064	8,500 gallon; IPA tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-065	15,000 gallon; empty organic chemical tank	pre-1967	Tank capacity < 40,000 gallons. Not subject to 10 CSR 10-5.500
EP-085	12,000 gallon; sulfuric acid tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-088	16,480 gallon; hydrochloric acid tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-090	10,000 gallon; nitric acid tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500
EP-092	5,765 gallon; phosphoric acid tank	pre-1967	Not a VOL. Not subject to 10 CSR 10-5.500

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**


Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

- 1) The specific pollutant regulated by that rule is not emitted by the installation;
- 2) The installation is not in the source category regulated by that rule;
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule;
- 4) The installation does not contain the type of emission unit which is regulated by that rule;
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

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Reviewed by:



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